

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE: PHILIPS RECALLED CPAP, BI-LEVEL  
PAP, AND MECHANICAL VENTILATOR  
PRODUCTS LITIGATION

Master Docket: No. 21-mc-1230-JFC  
MDL No. 3014

PHILIPS RS NORTH AMERICA LLC and  
PHILIPS NORTH AMERICA LLC,

No. 2:24-cv-01077

*Plaintiffs,*

v.

PSN LABS, LLC,

*Defendant.*

**PLAINTIFFS' MOTION FOR CONSOLIDATION INTO MDL**

Plaintiffs Philips RS North America LLC (“Philips RS”) and Philips North America LLC (“Philips NA”), through their undersigned counsel, hereby move this Court, pursuant to Fed. R. Civ. P. 42(a) and Paragraph 2 of Pre-Trial Order #1, for an order consolidating the above-captioned action into the above-captioned MDL, *In re Philips Recalled CPAP, Bi-Level PAP, and Mechanical Ventilator Products Litigation*, MDL No. 3014.

Dated: August 19, 2024

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I certify that on August 19, 2024, the foregoing Motion was filed electronically with the Clerk of Court, using the CM/ECF system. Notice of this filing will be sent to all parties who have appeared of record by operation of the Court's ECF system.

/s/ Erik T. Koons

Erik T. Koons